



## **The Escape Youth Club – Policy Document**

### **Privacy Policy**

We would like to tell you about what we do which will help you understand why we collect your data, how we use it, what we do to keep it safe and your rights about how we process your data. If you have any further information about it, please contact us at [info@theescapeyouthclub.com](mailto:info@theescapeyouthclub.com) – we would be delighted to help

The Escape Youth Club is a registered charity 1190278.

#### **What is personal data?**

Personal data is any data about, or that identifies you, the individual. Personal data can vary in its nature and consists of:

- Contact data e.g. name, contact details (email, phone, address etc)
- Personal data eg date of birth, gender, ethnicity etc
- Financial e.g. account details, credit/debit card details, financial transactions
- Social e.g. criminal, professional status (job title, salary etc), social networking, relationships, communications

## **What personal data do we collect?**

When you engage with us we may collect information about you. This may include any of the examples above, why you are interested in The Escape Youth Club, interactions you have had with us and other information relating to you personally which you may choose to provide to us.

Data protection law recognises that certain types of personal information are more sensitive. This is known as 'sensitive' or 'special category' personal information and covers information revealing racial or ethnic origin, religious or philosophical beliefs and political opinions, trade union membership, genetic or biometric data, information concerning health or data concerning a person's sex life or sexual orientation.

Sensitive information will only be collected where necessary, for example, we may need to collect health information from you when you register your child for a challenge event, take part in a sports programme, or visit one of our centres. We may need to understand more about your background to support the monitoring of the effectiveness of our programmes. Clear notices will be provided at the time we collect this information, stating what information is needed, and why and which parts are optional.

With your explicit consent, we may also collect sensitive personal information if you choose to tell us about your experiences for use in research or a case study.

## **Why we collect personal data and how we use it**

The Escape Youth Club offers a wide range of opportunities to young people through our programmes (e.g. sports, arts, youth action, employability). In addition to opportunities for young people, we work with young people and youth workers to influence policy makers by ensuring that young people are given a voice and appropriate channels to be heard. We also provide support to individuals and organisations that support young people.

We collect data in order to administer, deliver and monitor our services and support to young people and youth organisations, to fundraise and generate funds to support our work, to support our campaigns, respond to enquiries, and to meet our contractual and legal obligations.

The Escape Youth Club have strict safety and safeguarding policies in place which means that in addition to collecting data about our employees and volunteers for the purpose of their role with us, we capture other data in relation to criminal records.

In order to make what we do happen and to improve the lives of young people, we use personal data in the following ways:

- To administer the membership of youth organisations and provide and promote a range of support, opportunities and benefits to youth organisations
- To administer and monitor young people's participation on our programmes and the impact and outcomes for young people
- To undertake research and analysis to develop and promote policy and practice
- Promote opportunities to young people
- To promote, administer, run and facilitate participation in residential, day camp, swim school visits and activities at our outdoor residential centres
- To involve people in policy and advocacy work including research, events and responding to media opportunities

- To promote the work of The Escape Youth Club (using media content) through websites, social media, promotional materials, publications, press releases or other illustrations of our work
- To engage current and potential funders and fundraisers with opportunities to support our work and make what we do possible
- To process financial payments, donations and claim Gift Aid
- To ensure that all those working for The Escape Youth Club have had relevant checks to work with children, young people and vulnerable adults
- To manage staff and volunteers and manage applications.
- To respond to enquiries and complaints
- To undertake due diligence to manage risks

## **How we collect personal data**

### **Direct from the individual**

The Escape Youth Club collect data directly from individuals (e.g. young people, youth workers, teaching staff, fundraisers, funders, donors, current and potential employees, trustees etc) and those with parental/guardian responsibility for a young person.

When information is collected, we will explain what it is for and be clear about elements that are optional.

### **Third parties and external sources**

We receive data from third party platforms in relation to our donors that have been entered by the individuals themselves (e.g. those making donations to fundraisers via JustGiving etc who have opted in that their information be shared with The Escape Youth Club).

Where data is collected from an external source (i.e. not directly from the individual) and is to be held or use beyond the specific activity or event, we will notify the individual that we have obtained their data, how we intend to use it, and if required,

capture consent to market membership, funding opportunities and our services in the future.

### **Using media content (photo, video and audio content)**

To help promote the value of our work The Escape Youth Club take a range of photographic, video and audio content. Photos, videos and audio content may be used by The Escape Youth Club, or by our event partner(s) (including funders) and member organisations on websites, social media, promotional materials, publications, press releases or other illustrations of our work.

We will ask for consent from individuals that will be used in photos where they may be identifiable. Where the individual is under the age of 18 or a vulnerable adult we will seek consent of the parent/guardian. Consent can be withdrawn at any time (**see 'Withdrawing your consent' section**). If consent is withdrawn we will stop using the photos/videos/audio content for future purposes but may not be able to retract publications already in the public domain.

### **How you can withdraw your consent**

The Escape Youth Club capture consent for a number of its activities (identified above **'How we use personal data'**).

Consent can be withdrawn at any point by:

- Unsubscribing from an email or newsletter
- By contacting us on [info@theescapeyouthclub.com](mailto:info@theescapeyouthclub.com)

## **How we store and secure data**

### **Securing personal data**

The Escape Youth Club take its responsibility to protect personal data seriously. We ensure that our data is held securely within our main database and on our network. We use a range of tools and technologies to capture, process and store data securely. Only authorised employees and partners (employability programme), and those who process data on our behalf (e.g. software suppliers) have access to data.

### **Transferring data overseas**

The Escape Youth Club use a range of methods to capture data (e.g. paper, online etc). Online methods used to capture data may be carried out using data capture forms from a third party platform. When looking at potential tools and software, The Escape Youth Club ensure that as far as feasibly possible, data is stored within the European Economic Area (EEA). The GDPR requires special measures to be put in place where data is transferred outside of the EEA. Where the provider has multiple data servers (inside and outside of the EEA), and where there may be potential for the data to be transferred between locations, we ensure that sufficient measures are in place to protect the data and ensure that the provider is compliant with the GDPR and that appropriate security measures are in place. One way that we do this is by ensuring that the provider is signed up to the EU-US Privacy Shield.

### **How we share personal data**

The Escape Youth Club **does not** sell any personal data that we hold. The Escape Youth Club shares personal data with the following parties:

- Member organisations and partners delivering our programmes (for the purposes of networking and access to opportunities)
- Funders will receive aggregated and anonymised statistics only. These are shared with funders to demonstrate the impact of participation in our programmes

- HMRC and other organisations for the performance of employee contracts and processing Gift Aid payments
- Social Services, emergency services, the Health and Safety executive, local authorities and the police in the event of an emergency or in the event of a safeguarding issue (e.g. there is a risk to the safety of a young person or any other party) or to law enforcement agencies for the prevention and detection of crime
- Where we have a legal or regulatory obligation we will share data/information with the police, law enforcement agencies, the Government and statutory agencies or any other necessary parties
- The Disclosure and Barring Service (DBS) for the purposes of verifying suitability of those working with children and young people
- Third party suppliers: We may need to share your information with data hosting providers or service providers who help us to deliver our services, projects, or fundraising activities and appeals. These providers will only act under our instruction and are subject to pre-contract scrutiny and contractual obligations containing strict data protection clauses. We also may need to share your names with partners and venues hosting events for the purpose of registration.

### **How long do we keep personal data?**

The Escape Youth Club will only store your data for as long as necessary and in line with the original purpose(s) that it was collected. The Escape Youth Club collect, store and process personal data in line with our Data Protection Policy and have strict retention schedules outlined and adhered to in our Data Retention Policy. The Escape Youth Club also comply with its legal obligations to keep certain data for a period of time (e.g. Gift Aid declarations and financial transactions).

## **How we use cookies**

### **What is a cookie?**

Cookies are small text files that are placed on to your device (computer, smart phone etc) when you first visit a website which monitors interactions with the site.

### **How do The Escape Youth Club use cookies?**

The Escape Youth Club use cookies – technology to monitor interactions with our website (e.g. what pages you visit, services you interact with etc). We use this information to continually improve our website and to keep our content relevant.

### **How to reject cookies**

The Escape Youth Club's website allows users to reject cookies on their first visit to our website. The Escape Youth Club have a legal obligation to enable users to accept (e.g. consent) to The Escape Youth Club using cookies to monitor their interactions with the site or reject them.

You can block our cookies altogether by selecting the appropriate settings in your browser. However, it is important to remember that this may impact your use of the full functionality on our website. For further information on blocking cookies visit [www.aboutcookies.org](http://www.aboutcookies.org)

### **Third party cookies on The Escape Youth Club's website**

When visiting a page that has content embedded within it (e.g. YouTube etc), you may be presented with cookies from those sites. You are advised to check the third party websites for more information about how they use cookies and/or your data.



## **Your rights**

Individuals who we collect, process and store personal data about have a number of rights under the GDPR (General Data Protection Regulations) which include:

- The right to request a copy of the data that The Escape Youth Club hold about them
- The right to prevent processing for the purpose of direct marketing and profiling
- The right to be forgotten
- The right to have data rectified/updated

## **Accessing your data**

You are entitled to make a request to gain access to a copy of the data we hold and to find out how we use your data.

You may make a request at any time by contacting us [info@theescapeyouthclub.com](mailto:info@theescapeyouthclub.com) Your request will be processed free of charge. In the event of repeated/excessive requests The Escape Youth Club reserve the right to charge a fee.

When making a request, we will verify that you are who you say you are by checking appropriate forms of identification.

## **Personalisation and profiling**

In order to make our communications relevant, The Escape Youth Club may capture the preferences and interest of individuals to personalise what we send to you.

We may target particular opportunities based on information provided, for example where relevant, geographically. Data provided by fundraisers is also used as part of

the selection process to participate in external challenge events on behalf of London Youth.

You have the right to object to London Youth using your data for the purposes of direct marketing and profiling. Where prior consent has been given, you have the right to withdraw your consent (See **Withdrawing your consent** section).

### **The right to be forgotten**

If you no longer wish for The Escape Youth Club to store and process your data, you have the right to request that it be deleted. You can request this verbally or in writing and we will respond within one month of the request.

Under the GDPR The Escape Youth Club must respond to a request to have your data erased, however there are circumstances where we will be unable to erase data due to other obligations. For example:

- Where there are financial transactions on your record (where part of the data must be kept for a set period of time). In this instance, we will keep the data that must be held for financial and audit purposes and will erase all data not required for this purpose
- Where there has been a disciplinary/safeguarding issue etc.

Full details and an explanation of our decision will be communicated to you.

### **The right to rectification**

Individuals about whom we collect, process and store data have the right to have inaccurate data rectified or incomplete data completed.

If your data is inaccurate or incomplete, you have the right to request that we rectify it. The Escape Youth Club will respond to a request within one month of receipt. However, in certain circumstances we reserve the right to refuse a request (e.g. where there has been a disciplinary or safeguarding issue and the recorded information is a record of findings of an investigation).

### **Complaints**

If you have any concerns or questions about your data, the information contained within this notice or our Data Protection Policy, or you wish to make a complaint please contact us [info@theescapeyouthclub.com](mailto:info@theescapeyouthclub.com)

For further information on our complaints policy, please

If you are dissatisfied, or if you believe your data has been processed in a way that is not compliant with the GDPR, you have the right to complain to the Information Commissioners Office (ICO) by visiting their [website](#) or by calling 0303 123 1113.